

## REMARKS

Reconsideration of the above-referenced application in view of the following remarks is respectfully requested.

Claims 1-10 and 21-30 were pending in this application. Claims 1, 7-10, 21, 24, 26, and 29 have been amended. Claims 6, 22, and 27 have been cancelled.

The Examiner objected to the title of the invention as not being descriptive. The title has been amended in response to the objection.

The drawings were objected to for allegedly failing to show a "substrate having a plurality of contact pads." Applicant respectfully disagrees with the Examiner's assertion. Figures 2 and 3 show a circuit board 40 with wire bond connections between the board and chips 10 and 30. The wire bond connections are shown affixed to the board. Figure 4 also shows the wire connections to the board. One skilled in the art would appreciate that a wire is affixed to a board at a contact pad similarly to the attachments of the wire to chips 10 and 30. Therefore, Applicant respectfully submits that the claimed features are adequately shown in the drawings.

Claims 1-5 and 21 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Applicant's Admitted Prior Art in view of Takiar, et al. (U.S. Patent No. 5,495,398) and LoBianco, et al. (U.S. Patent No. 6,340,846). Claim 1, as amended, includes the feature of "a second attach layer having an area equal to said second chip bottom surface area and disposed between said first attach layer and said second chip bottom surface, said second attach layer being an insulating material having a thickness cooperable with said first attach layer to provide electrical disconnection of said first chip wire bonds and said second

chip." Neither Applicant's admitted art, nor Takiar, nor LoBianco teach or suggest such a limitation. Therefore, the combination of these references fails to teach or suggest all of the claimed features. For at least that reason, Applicant submits that Claim 1 is patentable over the combined references. Claims 2-5 depend from Claim 1 and are therefore patentable over the combined references for at least the reasons presented above. Claim 21 includes the feature of "a second attach layer adjacent to said bottom surface of said second chip and between said bottom surface of said second chip and said first attach layer." Neither Applicant's admitted art, nor Takiar, nor LoBianco teach or suggest such a limitation. Therefore, the combination of these references fail to teach or suggest all of the claimed features. For at least that reason, Applicant submits that Claim 21 is patentable over the combined references.

Claims 6, 8-10, 22, 23, and 25 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Applicant's Admitted Prior Art in view of Takiar, LoBianco, and Fogal (U.S. Patent No. 5,323,060). Claim 6 has been cancelled and the features of that claim have been incorporated into Claim 1. Claim 1 now includes the feature of "a second attach layer having an area equal to said second chip bottom surface area and disposed between said first attach layer and said second chip bottom surface, said second attach layer being an insulating material having a thickness cooperable with said first attach layer to provide electrical disconnection of said first chip wire bonds and said second chip." Fogal was cited as disclosing a second attach layer adjacent to the bottom surface of a second chip. However, there is no teaching or suggestion in Fogal or any of the other cited references of a second attach layer between said first attach layer and the bottom surface of the second chip. Applicant therefore submits that Claim 1 is patentable over the Applicant's admitted art, Takiar, LoBianco, and Fogal, whether taken singly or in combination, because of the failure of those references to teach or suggest all of the claimed features. Claim 8-10 depend from Claim 1 and are therefore patentable over the combined references for at least the reasons presented above.

Claim 22 has been cancelled. Claim 21 includes the feature of "a second attach layer adjacent to said bottom surface of said second chip and between said bottom surface of said second chip and said first attach layer." Neither Applicant's admitted art, nor Takiar, nor LoBianco, nor Fogal teach or suggest such a limitation. Therefore, the combination of these references fail to teach or suggest all of the claimed features. For at least that reason, Applicant submits that Claim 21 is patentable over the combined references. Claims 23 and 25 depend from Claim 21 and are therefore patentable over the combined references for at least the reasons presented above.

Claims 7 and 24 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Applicant's Admitted Prior Art in view of Takiar, LoBianco, Fogal, and Kuramochi (U.S. Patent No. 5,521,122). Claim 7 depends from Claim 1. Claim 24 depends from Claim 21. Claims 1 and 21 are patentable over the Applicant's admitted art, Takiar, LoBianco, and Fogal for the reasons presented above. Kuramochi is cited for its teaching of silicon dioxide and therefore does not cure the deficiencies of the other references. Therefore, Applicant respectfully submits that Claims 7 and 24 are patentable over the cited references at least by reason of their dependence upon Claims 1 and 21.

Claims 26-29 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Applicant's Admitted Prior Art in view of Takiar, LoBianco, and Tuckerman, et al. (U.S. Patent No. 5,804,004). Claim 26 has been amended to include the feature of "a second attach layer adjacent to said bottom surface of said second chip and between said bottom surface of said second chip and said first attach layer." Neither Applicant's admitted art, Takiar, LoBianco, nor Tuckerman teach or suggest such a feature. Therefore, Applicant respectfully submits that Claim 26 is patentable over the cited references taken singly or in combination. Claim 27 has been cancelled. Claims 28 and 29 depend from Claim 26 and are therefore patentable over the cited references for at least the reasons presented above.

Claim 30 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Applicant's Admitted Prior Art in view of Takiar, LoBianco, Fogal, and Kuramochi. Claim 30 depends from Claim 26. Claim 26 has been amended to include the feature of "a second attach layer adjacent to said bottom surface of said second chip and between said bottom surface of said second chip and said first attach layer." Neither Applicant's admitted art, Takiar, LoBianco, Fogal, nor Kuramochi teach or suggest such a feature. Therefore, Applicant respectfully submits that Claim 26 is patentable over the cited references taken singly or in combination. Claim 30 depends from Claim 26 and is therefore patentable over the cited references for at least the reasons presented above.

Applicant respectfully requests reconsideration and withdrawal of the rejections and allowance of Claims 1-5, 7-10, 21, 23-26, and 28-30. If the Examiner has any questions or other correspondence regarding this application, Applicant requests that the Examiner contact Applicant's attorney at the below listed telephone number and address.

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Respectfully submitted,



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